

Questions On Notice for the IOC's Inquiry into the Performance of the Victorian integrity agencies 2023/24 and 2024/25

IOC QUESTIONS ON NOTICE:

No.	Question	Draft response
1	What factors contributed to IBAC not meeting its timeliness targets for assessing complaints and notifications in 2023/24, and what changes did IBAC implement to improve its performance on these measures in 2024/25?	<p>IBAC aims to assess complaints within 45 to 90 days, depending on the complexity of the complaint, including the number of allegations and volume of material and evidence included.</p> <p>However, IBAC has seen the volume and complexity of complaints increase over time. In 2024/25 complaints and notifications increased by 18 per cent compared to the average across the three-year period.</p> <p>The complaint assessment process has also increased in effort as we include improvements to better consider complainant welfare and needs. Between 2021 and 2024, the length of IBAC's complaint assessments increased by 60 per cent due to a greater (and necessary) focus on communication with complainants, and the introduction of trauma-informed approaches to complaint assessment.</p> <p>While the workload has increased our resources have remained the same with no increase in staff or technology, resulting in delays to assessing complaints.</p> <p>It must be noted, however, that IBAC triages complaints to ensure that those that are of a higher risk are prioritised for assessment.</p> <p>In an effort to improve assessment times, in 2024/25 the Complaint and Assessment Services (CAS) Optimisation project began implementation.</p>

No.	Question	Draft response
		<p>This project aimed to optimise the design of complaint handling systems, processes and ways of working to make the complaint assessment function including the assessment of Public Interest Complaints more efficient.</p> <p>Our current system and processes are largely manual therefore improvements are generally limited to human process improvements.</p> <p>We are also trialling enhancements to our assessment process, including a new complaint prioritisation matrix to help us more efficiently prioritise complaints.</p> <p>Complaints are triaged and prioritised for assessment based on a number of factors, including complainant welfare and whether the matter relates to serious or systemic corruption or misconduct.</p> <p>Other improvements include updating the online complaint form to allow users to upload attachments when making the complaint, reducing the time required to request and receive materials from complainants.</p> <p>IBAC also formed a dedicated team drawn from across the organisation to work on assessing complaints that are outside of our target times.</p>
2	<p>What factors contributed to IBAC not meeting its timeliness targets for assessing Public Interest Disclosures and PID notifications in both 2023/2024 and 2024/25, and how will IBAC improve its performance against these targets?</p>	<p>The increase in the number of complaints and notifications and the complexity of the assessment process combined with no increases to resources has led to IBAC not meeting the PID targets.</p> <p>This problem and IBAC's steps to improve operations within our current budget are described above in answer to question 1.</p>
3	<p>What factors contributed to the significant drop in assessment rates for complaints and notifications in 2024/25, and how will IBAC return to its previous rates of complaint assessment?</p>	<p>The length of time for an assessment depends on the complexity of the complaint, many complaints contain a number of allegations that need to be assessed on their individual evidence, which can take a longer period of time – however we aim for between 45 and 90 days depending on the complaint's complexity.</p> <p>A complaint is first triaged to determine if there's imminent risk, or if it relates to significant serious or systemic corruption, and if so, those matters are prioritised. The triage also considers the complaints' complexity, so they can be delegated to the most appropriate team member for assessment.</p> <p>When assessed, IBAC considers a number of factors – including if the allegations are within IBAC's jurisdiction, whether there is sufficient information which supports that the alleged conduct is within</p>

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		<p>the definition of corrupt conduct or police misconduct and if the matter is considered serious or systemic.</p> <p>Sometimes it requires assessment officers to reach back out to complainants to request more information or material, in order to thoroughly assess their complaint.</p> <p>We've also seen our complaints handling processes adopt a trauma-informed approach – which is good and necessary, but it often requires additional time to thoroughly assess and respond to each allegation, and provide information to complainants who can themselves have complex needs. Between 2021 and 2024, the length of IBAC's complaint assessments increased by 60 per cent due to these added processes.</p> <p>In an effort to improve assessment times, we have implemented a number of measures, including forming a dedicated team drawn from across the organisation to work on assessing complaints that are outside of our target times.</p> <p>Our current system and processes are largely manual therefore improvements are generally limited to human process improvements.</p> <p>We are also trailing enhancements to our assessment process, including a new complaint prioritisation matrix to help us more efficiently prioritise complaints.</p>
4	<p>Will IBAC implement findings from its successful Focused Police Complaints Pilot in other business areas? Otherwise, please advise of other learnings from that pilot.</p>	<p>IBAC has completed its transition from the Pilot into an embedded and ongoing Focused Police Complaints Team (FPCT).</p> <p>The new team has more resources so that IBAC can undertake more police personnel conduct investigations and engage with more communities and complainants.</p> <p>The Pilot evaluation and Focused Police Complaints Pilot report was an opportunity for IBAC to reflect on what worked well during the Pilot, and identify enhancements that will further improve the Focused Police Complaints Team.</p> <p>The new team's statement of purpose is: <i>To deliver timely and independent investigation outcomes to people from communities at a higher risk of experiencing police misconduct.</i></p> <p>The Focused Police Complaints Team investigates single-incident complaints from people and communities who are considered at a higher risk of experiencing police misconduct, including:</p> <ul style="list-style-type: none"> • Aboriginal and Torres Strait Islander peoples

No.	Question	Draft response
		<ul style="list-style-type: none"> • people who identify as LGBTIQ+ • people from culturally and linguistically diverse backgrounds • children • people with mental illness • people with disability • people who are experiencing homelessness. <p>The FPCT model has been very effective – and allowed these complaints to be progressed, assessed and investigated more efficiently.</p> <p>IBAC released data and information relating to the FPCT’s first 12-months of embedded operation in December 2025.</p> <p>Since the FPCT was embedded in December 2024 up to 10th February 2026, the team had assessed 120 complaints and commenced 36 investigations.</p> <p>The FPCT, in the same period, made 30 recommendations to Victoria Police and charged one police officer with the common assault of a child.</p> <p>The single incident complaint focus of the FPCT does not directly translate to public sector corruption investigations. However, insights, intelligence, findings and learnings are utilised across IBAC’s operations.</p> <p>The FPCT is a multidisciplinary team made up of investigators, policy and research team members and lawyers, this combination allows us to make decisions and respond to investigative leads more quickly and collate learnings and analyse trends.</p> <p>The FPCT works closely with many other business areas, and its learnings inform a number of prevention activities. Matters it refers are often subject to reviews, themes and trends from its investigations inform further reviews or research activity, subsequent requests for action, and engagement with stakeholders including training IBAC conducts with Victoria Police.</p> <p>The FPCT also participates in engagement activities focused on engaging with the focused communities, to improve trust and awareness of IBAC and the FPCT’s work.</p>

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5	<p>In 2024/25 IBAC paid Cube Group Management Consulting \$165,000 to develop 'a strategic framework informed by an updated environmental scan and evaluation of strategy implementation'. What was this strategic framework and how did it contribute to the performance of IBAC's functions?</p>	<p>IBAC engaged Cube Group to conduct external engagement, research and a review of our work to inform a 'strategic framework' which we used in the development of the IBAC Strategy 2025-28.</p> <p>The strategic framework was shaped through consultation with IBAC's leaders and staff working group and was also informed through extensive engagement with internal and external stakeholders. Using an external consulting group helped to make the research and internal/external engagements more independent,</p> <p>As one of Victoria's core integrity agencies, responsible for oversight the public sector and police, the IBAC Strategy's objectives are crucial to aligning priorities and marking IBAC's commitments for the years ahead.</p> <p>Each objective focuses on bringing value to the Victorian public, either through building trust in IBAC's work, strengthening community confidence in IBAC's police oversight function, maximising the impact of intelligence efforts or ensuring our workforce are empowered to deliver.</p> <p>Strategic priorities underpin each objective, detailing specific aims such as improving the complainant experience, strengthening IBAC's approach to preventing, identifying and investigating police misconduct through meaningful engagement with diverse communities, strengthening collaboration across the Victorian integrity system to identify emerging challenges and continuously improving systems to enable innovative ways of working.</p> <p>The IBAC Strategy guides our activities for this three-year period, including prioritising matters under our core functions such as investigations, reviews, assessments, prevention, engagement and communication work.</p>
6	<p>What work has IBAC done to monitor police-perpetrated predatory behaviour since its 2022 report on this issue?</p>	<p>In 2023, IBAC released its thematic review on predatory behaviour by police.</p> <p>Victoria Police accepted the five requests for action from the thematic review and agreed to inform IBAC about progress on their implementation.</p> <p>As a result of the thematic review Victoria Police released its updated conflict of interest policy. This policy provides guidance for employees on the declaration and management of intimate or personal workplace relationships. It specifies that where there is a direct reporting line between two officers in an intimate or personal relationship, a conflict of interest must be declared and a management plan put in place.</p> <p>IBAC's Annual Plan 2025-26 includes police-perpetrated family violence and police responses to family violence as one of four corruption and police misconduct priorities.</p>

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		<p>IBAC prioritises reviews of Victoria Police investigations related to police-perpetrated family violence and oversees Victoria Police’s responses to recommendations for improvement.</p> <p>IBAC also conducts regular training with Victoria Police at various ranks and regularly engages with them regarding recommendations and requests for action.</p>
7	<p>What are the obstacles to IBAC not meeting its workforce gender equity target in 23/24 and 24/25, and how will IBAC improve its performance against this target in future years?</p>	<p>Drivers of this result include occupational segregation patterns in certain types of roles and areas of the business and corresponding impacts on access and distribution of shift work. This has led to increased total remuneration and continued occupational concentration of women in clerical and administrative roles rather than a broad gender balance in this category.</p> <p>IBAC made notable progress in reducing its gender pay gap from 9.6 per cent in 2023 to 6.5 per cent in 2025, showing the effectiveness of monitoring initiatives detailed in the annual report, despite not meeting the median target.</p> <p>Reductions in the pay gap across workforce groups have driven this improvement. In 2025, the mean pay gap for managers was -15.3 per cent, indicating women earned more than men, reversing a 2.1 per cent gap in 2023. The gap for professionals decreased from 7.6 per cent to 6.5 per cent, and for clerical and administrative workers from 12.6 per cent to 5.1 per cent. Among senior leaders, women earned more with a -12.6 per cent gap, while SES roles showed base and total remuneration gaps of -16.7 per cent and -15.4 per cent, both in favour of women.</p> <p>In 2025, IBAC’s mean gender pay gaps (3.5 per cent base, 6.5 per cent total) are well below both the national (16.7 per cent base, 21.1 per cent total) and Victorian public sector averages (14.1 per cent base, 15.6 per cent total). However, IBAC’s median gaps (9.5 per cent base, 11.7 per cent total) remain above the 2023 Victorian public sector averages (7.4 per cent base, 9.1 per cent total) though still lower than the national average (11.9 per cent base, 15.7 per cent total).</p> <p>IBAC has committed (via the 2026-30 Gender Equality Action Plan) to:</p> <ul style="list-style-type: none"> • Regularly analyse, monitor, and report gender pay gap trends by work area and intersecting identities to guide progress. • Identify and address policies affecting the gender pay gap, such as bias in pay, promotion, recruitment, retention, and job segregation. • Enhance transparency in pay progression and promotion with accessible resources on the intranet, while strengthening pay equity data literacy among leaders and hiring managers.

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		<ul style="list-style-type: none"> Implement diverse actions to reduce segregation and advance equity, supporting overall gender pay equity objectives. <p>The 2026-30 Gender Equality Action Plan is due to be approved and published by the Commission for Gender Equality in the Public Sector in late 2026.</p>
8	<p>Since the 2024 People Matter Survey results, what initiatives has IBAC implemented to improve rates of incivility, bullying, harassment and discrimination?</p>	<p>Strengthening our organisational culture to ensure employees feel supported, valued and empowered remains a priority for IBAC.</p> <p>Any reports of inappropriate behaviour, including bullying, undermine our values and are taken seriously, with targeted support to investigate and resolve issues when they occur.</p> <p>IBAC's leaders engage with teams across the organisation to discuss the People Matter Survey (PMS) results each year, to inform the development of an action plan, which includes everyone in addressing concerns and continuing to improve our organisation's culture and employee engagement.</p> <p>Since the 2024 survey, IBAC employees have taken part in appropriate behaviours training to continue enhancing our understanding of IBAC's values and how we can contribute to a positive and professional workplace culture. This training, along with training tailored to strengthen leadership, will continue.</p> <p>IBAC continues to have options for staff to report matters formally and confidentially, including via a confidential external telephone line, Stopleveline. Targeted and tailored support also occurs for business areas including debriefing sessions, cultural reviews, and targeted training in psychological safety.</p> <p>Since the 2025 PMS, IBAC continues to enhance early intervention, with timely EAP access and organised debriefing. Leadership development including communication and guidance for people leaders has been aimed at supporting leaders in identifying and addressing incivility, bullying, harassment or discrimination. The appropriate behaviours training for staff has continued and has been developed into an e-module to ensure the training is accessible to all.</p> <p>Other wellbeing initiatives such as flexible work options, wellbeing and resilience programs, promotion of mental health awareness and support options are continuing.</p> <p>We also have working groups established to continually assess our work in addressing the action plan items identified as a result of the PMS, and progress improvements in this space.</p>
9	<p>Has IBAC used insights from its Perceptions of Corruption Surveys and/or</p>	<p>IBAC uses insights, data and intelligence across all areas of its operations. In particular, findings from the Perceptions of Corruption surveys are applied to a range of internal and external activities.</p>

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	<p>data dashboards to inform planning for other elements of its business activities, such as reviews, education or workplace development?</p>	<p>The data provides insight into levels of awareness, perception and understanding of corruption and misconduct across different stakeholder groups. This information supports IBAC's work and helps stakeholders reflect on their own risks and where integrity efforts would be most effective.</p> <p>Internally, survey data informs KPI reporting and annual planning processes, including environmental scanning. It also supports IBAC's prevention work, including the development of products and reports such as sector profiles.</p> <p>Findings are incorporated into presentations, meetings and events to build awareness of key corruption risks among staff and stakeholders. IBAC also offers presentations for staff and, on request, for specific stakeholder groups and committees (for example, Victoria Police coordination committees and former community steering committees).</p> <p>Interactive dashboards are used in external engagement to identify trends, risks and emerging issues. These insights support discussions in quarterly meetings with departments and help target locations for stakeholder forums, including regional local government forums.</p> <p>The Complaint and Assessment Services and Reviews teams use the dashboards when assessing complaints or undertaking a review.</p> <p>The Register of Complaints Serious Incidents and Discipline (ROCSID) dashboard is useful for IBAC's intelligence work, it provides a good summary in one location, including outcomes.</p> <p>The police risk system has attracted widespread adoption, particularly by operational, prevention, engagement and strategic risk teams at IBAC. Eg:</p> <ul style="list-style-type: none"> ○ referenced in proposals for new preliminary inquiries into police serious misconduct, when assessing complaints by the Focused Police Complaints Team and when preparing operational intelligence products ○ provides context to the executive in discussions about risks associated with particular police officers or work units and is used to identify suitable police work units for targeted engagements. ○ is used to help identify reviews to be undertaken and in defining IBAC's Strategic Focus Areas ○ to help pinpoint locations for targeted police misconduct advertising campaigns.

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10	<p>Following the High Court's 2024 decision in AB vs IBAC, what processes are now in place for providing information to individuals facing adverse findings during the course of investigations?</p>	<p>The High Court's decision in AB vs IBAC does not impact IBAC's processes during the course of an investigation, instead it impacts the natural justice process for a special report related to an investigation, or when IBAC is releasing potentially adverse material, comments or information.</p> <p>Since the High Court's decision IBAC has developed a new Natural Justice overarching policy and procedure and procedure for special reports. These are currently going through a process of review.</p> <p>The overarching policy provides an overview of Natural Justice (NJ), what it is and how it applies to IBAC, and the exercise of its powers, duties and functions. While the natural justice for special reports procedure provides specific guidance to IBAC officers involved in the special report NJ process about IBAC's obligations, their roles and responsibilities and key stages in the process.</p> <p>IBAC now undertakes a two-step process. First, Legal reviews all draft reports to ensure that the substance and gravamen of the underlying evidence IBAC is relying on to make adverse comments or opinions about persons (or findings about public bodies) is contained in the report itself. This step is conducted because the High Court in AB held that in most cases providing the substance and gravamen of the underlying evidence would be sufficient for IBAC to discharge its obligations under s 162(3) of the IBAC Act.</p> <p>As the High Court also said that there may be instances where providing the substance and gravamen won't be sufficient, IBAC conducts a second process to assess whether a person (or a public body) requires access to the evidence itself (or further information about the evidence) to meaningfully respond to the adverse comments, opinions or findings in a draft report. If an assessment is made that they do require the evidence itself (or more details about the evidence), that material is provided along with the draft report content.</p> <p>In addition to these steps, which occur before draft reports are circulated to affected parties, IBAC can consider requests for additional information or evidence from affected parties who form the view that they require access to this material after receiving a draft special report. IBAC assesses these requests on a case-by-case basis.</p> <p>Since the decision in AB, IBAC can confirm that it has provided persons with underlying evidence (including transcripts of lawfully intercepted calls) to facilitate their consideration and response to adverse comments and opinions about them in a draft report.</p>

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11	<p>What progress has there been in revising IBAC's Budget Paper 3 performance measures since 2024?</p>	<p>An internal review of IBAC's BP3 measures was conducted in 2024. As part of this review, IBAC consulted with the Department of Treasury and Finance on the proposed changes to the measures to ensure they better aligned with IBAC's functions and core work, with final 2025-26 Budget Papers submitted in May 2025.</p> <p>IBAC remains committed to ensuring long term consistent targets and will continue to review its BP3 measures annually, in consultation with DTF.</p> <p>On 1 July 2025, IBAC introduced a new BP3 measure to consider and report the quality of IBAC's complaint assessments.</p> <ul style="list-style-type: none"> • Measure: Percentage of assessments that meet quality standards • Target: 80 per cent. • The new BP3 measure will be derived from data and insights from IBAC's quality audits by the Quality Assurance function within the Complaints and Assessment Division. The Quality Assurance function is responsible for monitoring the quality of complaint assessments to ensure assessments and decisions: <ul style="list-style-type: none"> ○ are traceable to decision authorities in the IBAC Act ○ have been made by the appropriate IBAC delegate ○ have documented evidence base, clear reasoning and clear recommendations ○ are consistent with legislation and IBAC's policies and procedures. <p>As the Committee is aware, IBAC has commenced a Complaints & Assessment Optimisation Project to deliver sustainable improvements to how our complaint and assessment function operates. As part of this project, IBAC will review many existing processes and practices - the result of which may necessitate change in the metrics used to measure the effectiveness of IBAC's complaints and assessment function.</p>
12	<p>Do you have a formal reflection process at the conclusion of a complaint/investigation to ensure IBAC continues to learn from and improve on processes?</p>	<p>IBAC's Investigation Framework embeds 'status reports' at the end of each planned phase or change of activity in the investigation. Status reports, along with investigative information, reflect on the operation thus far and list lessons learnt to promote improvements in the next phase or for future matters.</p>

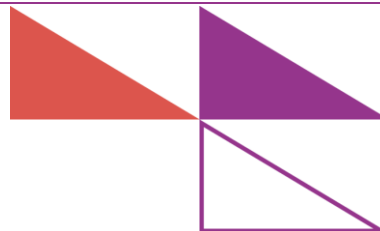
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		<p>This ensures that we embed formal reflection throughout operational or investigative activities, and not just at the conclusion, allowing for continual real-time improvements to be discussed and implemented.</p> <p>IBAC's Complaint and Assessment Services team has a Quality Assurance framework which includes processes to undertake quality audits of 10-15% of all assessments completed by the division. This process identifies systemic issues and opportunities for staff one-on-one feedback. This framework drives a continuous improvement cycle for staff and the division, assisting to identify coaching, training and staff development opportunities. The audit findings are reported to organisational committees on a quarterly basis.</p>
13	<p>You have stated that you have introduced a trauma-informed response to complainants. What training have your staff undertaken in this area, when was it implemented, and what work are you doing to ensure your ongoing interactions with complainants continue to align with trauma-informed practice?</p>	<p>In 2023/24 and 2024/25 IBAC Complaint and Assessment Services (CAS) employees undertook training across a number of areas including – Charter of Human Rights, dealing with complex behaviours, plain English writing and appropriate behaviours.</p> <p>In addition, CAS employees undertook trauma-informed and vicarious trauma awareness training. CAS employees were involved in more than seven trauma-informed practices training sessions, including all-of-division training and individual team sessions. These training sessions involved two workshops on CAS' Complaint Management Guidelines and how these align with trauma informed practices, and the implementation of IBAC's wellbeing policy. While the further five workshops supported both senior leaders and individual teams in focusing on role specific practices.</p> <p>IBAC's Investigations teams have also been supported with training, while also working closely with the Witness Liaison team, to consider individual circumstances and wellbeing needs of witnesses and support trauma informed communication practices.</p> <p>IBAC has adopted a trauma-informed approach in complaints handling processes – which is important and necessary, but it often requires additional time to thoroughly assess and respond to each allegation, engage with complainants, and provide information to complainants who can themselves have complex needs.</p> <p>IBAC's acknowledgement letters to complaints at various stages in the process have been updated - these letters have been revised using clear and accessible language and trauma-informed principles to make it easier to understand IBAC's assessment processes and what to expect after making a complaint to IBAC.</p>

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		<p>IBAC has made key enhancements to our online form enabling a better user experience, including the ability to provide attachments securely when submitting a complaint.</p> <p>To complement this, an optimisation program to assess what improvements we can make to our complaints assessment systems and processes is underway – this is a multi-year project but is essential work to continually improve our focus on complainants, our people and our ways of working to increase efficiency and enhance the experience for complainants.</p> <p>This is a strategic priority for us in our 2025/26 Annual Plan - to make the complaints process more accessible and improve peoples' experience through more timely assessments, consistent communication and trauma-informed practices.</p>
14	<p>What documentation and information can you provide to the Committee regarding your interactions with the Department of Justice and Community Safety regarding proposed legislative reform to give IBAC follow-the-money powers?</p>	<p>IBAC meets regularly with representatives from the Department of Justice and Community Safety (DJCS), including on at least seventeen occasions in 2025.</p> <p>Legislative change was discussed on several occasions during these engagements, including in the September and December 2025 quarterly meetings where IBAC Commissioner Victoria Elliott and IBAC CEO Alison Byrne met with the DJCS Secretary and/or Deputy Secretary (DJCS Secretary absent from September meeting) and discussed IBAC's submission on proposed changes to the IBAC Act and the IOC's recommendations following the hearings.</p> <p>IBAC has publicly advocated for a number of years for various changes to the <i>Independent Broad-based Anti-corruption Commission Act 2011</i> (the IBAC Act), including as early as 2016, as seen in the Strengthening Victoria's Integrity Agencies report.</p> <p>In 2025, the IOC held an inquiry into the adequacy of the legislative framework for IBAC, including public submissions and hearings.</p> <p>IBAC prepared a detailed submission, including the recommendation that IBAC is given 'follow the dollar' powers, the definitions of public officer and public body are updated, and that the extraordinary circumstances requirement for public hearings is removed to allow IBAC to hold more hearings publicly. Noting that these submissions would be made publicly available and considered by the IOC before a report is released with recommendations to government.</p> <p>Commissioner Elliott spoke further at a public hearing with the IOC about how 'follow the dollar' powers would improve IBAC's ability to investigate allegations of corrupt conduct associated with public sector subcontractor arrangements.</p>

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		<p>The IOC then made recommendations to government which include giving IBAC ‘follow the dollar’ powers, among other key recommendations aligned with IBAC’s submission including updating the definitions of public officer and public body. IBAC looks forward to the government’s response.</p> <p>The detail, publicity and scale of the inquiry held by the IOC, along with IBAC’s regular engagements with DJCS, is adequate in making it clear to government the changes required to the IBAC Act to ensure it is fit-for-purpose in empowering IBAC to effectively expose and prevent public sector corruption and police misconduct in Victoria.</p>
15	<p>IOV has stated their view that section 166 of the <i>IBAC Act 2011</i> (Vic) ‘does not apply to the media if IBAC provides them an embargoed copy of a special report prior to tabling’ and that they have worked with IBAC regarding this. What work have you done with IOV regarding providing embargoed reports to the media?</p>	<p>While IBAC has determined that a broader interpretation of s 166 ought to be favoured, we agree there is ambiguity. As such, IBAC has advised the IOV that it will not rely on this provision as a legal protection in any disclaimers that accompany embargoed reports.</p> <p>IBAC determines its position on providing a Special Report to witnesses and stakeholders on a case-by-case basis.</p> <p>IBAC has recently drafted a formal guideline for the development of its stakeholder engagement and communications plans – this guideline includes advice on embargoed reports. This guideline is currently undergoing an internal consultation and approval process.</p> <p>The finalised guidance will articulate the matters to be considered when deciding to release an embargoed report, and the safeguards to help protect confidentiality until it is tabled.</p> <p>IBAC will provide its draft final guidance to Integrity Oversight Victoria.</p>
16	<p>Please describe how your External Communication and Reporting Framework or other processes have improved timely completion and reporting on investigations through special reports.</p>	<p>In 2024, IBAC developed and implemented an External Communication and Reporting Framework that sets out how we develop, manage and deliver external reports and associated communication products to expose and prevent corruption and police misconduct.</p> <p>The framework highlights the process and governance required to develop a special report from the development of its scope, through to research, stakeholder consultation, development of recommendations, natural justice and publishing.</p> <p>The framework is designed to ensure special reports are developed in a consistent, efficient and streamlined manner and to ensure procedural fairness obligations are addressed.</p>

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		<p>IBAC is committed to developing special reports as efficiently as possible, however, the time required to undertake an investigation and publish any associated special report can vary significantly between reports.</p> <p>This can be impacted by several factors, including the size and complexity of the investigation, number of people or public bodies involved, volume of material gathered, duration of the natural justice process and legal delays.</p> <p>While these factors are unique to each publication, the Framework seeks to set out a clear process to provide guidance that supports efficiency and timely progress.</p>
17	<p>Please advise if IBAC is considering the use of a two-way messaging function for anonymous complaints and describe your considerations or other methods of preserving anonymity.</p>	<p>IBAC regularly considers improvements to the complainant experience, including methods of reporting and communication securely and anonymously.</p> <p>IBAC is considering the use of a two-way messaging function for anonymous complaints to help collect additional relevant information while maintaining anonymity of the discloser.</p> <p>IBAC has made enquiries with Integrity Oversight Victoria about how the function they use works and the technology underpinning it. Further to this, initial desktop research has been undertaken, and we've begun exploratory discussions with our website developer regarding the approach and technology options.</p> <p>Our key considerations at this stage include:</p> <ul style="list-style-type: none"> • Ensuring the function is designed and secured according to Victorian Protective Data Security Standards. • Ensuring the function is easy to use, including clear instructions for users on how to utilise it and preserve their anonymity. • Integration with existing IBAC information collection processes and our case management system. • Cost to implement and maintain, including adequate staff resourcing to monitor and respond to incoming messages. <p>IBAC's online corruption and misconduct reporting platform is designed and secured according to Victorian Protective Data Security Standards.</p> <p>The platform is regularly security penetration tested by certified independent expert providers, with the most recent penetration test occurring in November 2025.</p>

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		<p>Whistleblowers who wish to protect their anonymity and privacy even further from IBAC and any agency we may refer their complaint to, can opt to make their report anonymously.</p> <p>This option is clearly presented on our reporting platform, along with an explanation of how IBAC protects privacy for all reports received under relevant laws.</p>



Questions On Notice for the IOC’s Inquiry into the Performance of the Victorian integrity agencies 2023/24 and 2024/25

IOC RECOMMENDATIONS UPDATES:

No.	Recommendation	Committee questions	IBAC Response
19	<p>That IBAC should formally establish a dedicated Police Corruption and Misconduct Division to increase public confidence in Victoria’s system for the handling of complaints about police corruption and other misconduct, improve its capacity to conduct effective investigations, enhance its independence, develop its expertise and improve its overall performance. This division should consolidate IBAC’s legislated functions that relate to complaints and disclosures about police corruption and other misconduct in Victoria. It should have dedicated teams for:</p> <ul style="list-style-type: none"> • Complaint receipt and assessment • Investigations and referrals (including reviews and audits of 	<p>Please provide an update on the progress in implementing this recommendation.</p>	<p>IBAC partially accepts this recommendation – work is ongoing.</p> <p>IBAC is finalising its response to this recommendation and plans to respond by 4 June 2026. While the six-month timeframe under s 36 of the <i>Parliamentary Committees Act 2003</i> does not apply to IBAC, we have adopted that timeframe for this response. Once the response is finalised, we propose this recommendation be closed.</p>

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	<p>investigations and own motion investigations)</p> <ul style="list-style-type: none"> Public information and communications Welfare management (of complainants and those subject to investigation) In-house and external training (with respect to IBAC and Victoria Police personnel) Research and prevention. IBAC should retain the discretion to allocate resources, including staff, between divisions in its organisation. 		
31	<p>That IBAC in consultation with Gellung Warl, as the permanent representative and deliberative body for Traditional Owners and First Peoples in Victoria, establish a dedicated, appropriately resourced Aboriginal Engagement Unit led by a First Nations leader to, amongst other things:</p> <ul style="list-style-type: none"> embed culturally safe, trauma-informed practice co-design engagement with communities strengthen independence and investigative capability (including 	<p>Please provide an update on the progress in implementing this recommendation.</p>	<p>IBAC partially accepts this recommendation – work is ongoing.</p> <p>IBAC is finalising its response to this recommendation and plans to respond by 4 June 2026. While the six-month timeframe under s 36 of the <i>Parliamentary Committees Act 2003</i> does not apply to IBAC, we have adopted that timeframe for this response. Once the response is finalised, we propose this recommendation be closed.</p>

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	<p>in deaths and serious injury matters) and;</p> <ul style="list-style-type: none"> improve complaint handling, transparency and outcomes to rebuild trust. 		

Performance of the Victorian integrity agencies 2022/23

No.	Recommendation	Implementation progress advised by IBAC in a letter dated 31 October 2025	Committee Questions	IBAC Response
2	<p>That the Independent Broad-based Anti-corruption Commission (IBAC) develop, use and consistently publicly report on key quantitative and qualitative performance indicators (including complexity indicators) for its assessment of complaints and notifications. This will allow for more precise tracking and evaluation of IBAC's performance across financial years, including its compliance with quality and timeliness standards in making assessments.</p>	<p>IBAC accepts this recommendation and it is completed in part.</p>	<p>Please provide an update on the progress in implementing this recommendation.</p>	<p>IBAC accepts this recommendation – which is completed in part, with work ongoing.</p> <p>Further to our response provided in October 2025, work continues on this recommendation with the next update to be provided to the IOC by the end of the financial year.</p> <p>As the Committee is aware, IBAC has in place timeliness measures relating to complaints assessment – the results of these measures are published in IBAC's Annual Report.</p> <p>On 1 July 2025, IBAC introduced a new BP3 measure to consider and report the quality of IBAC's complaint assessments.</p> <p>In addition, IBAC has commenced a Complaint & Assessment Optimisation Project to deliver sustainable improvements to how our complaint and assessment function operates.</p>

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				<p>As part of this project, IBAC will review many existing processes and practices - the result of which may necessitate change in the metrics used to measure the effectiveness of IBAC's complaints and assessment function. At the completion of this project, IBAC will take into consideration the Committee's recommendation for IBAC to develop and report on key quantitative and qualitative performance indicators.</p> <p>IBAC will keep the Committee informed of the outcome of this important improvement project.</p>
12	<p>That the Independent Broad-based Anti-corruption Commission, as part of its police-oversight function, consider undertaking a systematic review of Victoria Police (including its Sexual Offences and Family Violence Unit) policies, processes and practices in assessing, handling and investigating complaints about police and, in particular, their capacity to effectively manage conflicts of interest and risks of police-perpetrated family violence.</p>	<p>IBAC accepts this recommendation and it is completed in part.</p>	<p>Please provide an update on the progress in implementing this recommendation.</p>	<p>IBAC accepts this recommendation - which has been completed in part and work is ongoing.</p> <p>Police perpetrated family violence (PPFV) has been a strategic focus area for IBAC for several years.</p> <p>IBAC continues work on the special report on '<i>Victoria Police's Handling of Police Perpetrated Family Violence (PPFV)</i>'. IBAC's special report will seek to:</p> <ul style="list-style-type: none"> • highlight the implications of misconduct around the handling of police perpetrators of family violence, and the consequences for victim survivors and the broader community • influence Victoria Police to address any identified ongoing risks and issues present with current policy settings • make recommendations where required to improve Victoria Police's management of police perpetrated family violence.

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				<p>To date IBAC has built a strong evidence base for the special report, which will include an assessment of how Victoria police manage conflicts of interest.</p> <p>IBAC will consider this recommendation and the issues raised by the IOC as it progresses and finalises the special report.</p>

The independent performance audits of the Independent Broad-based Anti-corruption Commission and the Victorian Inspectorate report

No.	Recommendation	Implementation progress advised by IBAC in a letter dated 31 October 2025 and during the IOC's 2022/23 performance review	Committee Questions	IBAC Response
1.3.2	Implement the intelligence framework	Implementation in progress	Please provide and updated on the implementation of the intelligence framework, and embedding into IBAC's processes	<p>IBAC considers this recommendation implemented and closed.</p> <p>The Intelligence Framework was introduced in February 2024. The Framework is now available in the IBAC Policy centre. All aspects of the Intelligence Framework have been fully implemented and completed.</p>
2.2.2	Implement the investigations framework to support better prioritisation and management of investigation activities.	The investigations framework has been implemented; an action plan is being developed to incorporate feedback and findings arising from reviews.	Please provide an update on the development of the action plan for incorporating feedback and findings in IBAC's investigations framework.	<p>IBAC considers this recommendation implemented and closed.</p> <p>The Investigations Framework was introduced in September 2023. Following an initial review in 2024, the updated framework was launched in November 2024. The Framework is now available in the IBAC Policy centre. All aspects of the Investigations Framework have been fully implemented and completed.</p>
4.5.1	Implement the recommendations from the mwah report to address gaps in workforce planning.	Implementation in progress in conjunction with IBAC's People Strategy objectives.	Please provide an update on the progress in implementing this recommendation and also describe how you've implemented the recommendations from the mwah	<p>IBAC accepts this recommendation - work is ongoing.</p> <p>IBAC continues to prioritise ensuring a healthy and engaged workforce. Based on feedback from staff through our People Matter Survey results and from</p>

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			report to address gaps in workforce planning.	<p>senior leaders, the IBAC Strategy 2025-28 includes a specific people-focused strategic objective rather than have a separate People Strategy. The aim by doing this is to better highlight the necessity of our people to our performance and delivery.</p> <p>Plans and actions are in place to support this objective including our Health Safety Wellbeing Plan 2025-28, Mental Health Framework, our new Gender Equality Action Plan and work on an innovate Reconciliation Action Plan.</p> <p>IBAC will be establishing a workforce plan to align with the reduction of funding.</p>
4.6.1	Conduct a training needs analysis for VPS employees	IBAC has partially implemented this recommendation and work is ongoing.	Please provide an update regarding progress on implementation	<p>IBAC accepts this recommendation - work is ongoing.</p> <p>IBAC prioritised the development of a capability framework for the Operations Division and is currently exploring a capability framework for the Complaint and Assessment Services Division. This approach of reviewing training/capability needs will be applied across the remaining IBAC divisions.</p>

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Performance of the Victoria Integrity agencies 2021/2022

No.	Recommendation	Implementation progress advised by IBAC in a letter dated 31 October 2025	Committee Questions	IBAC Response
3	That if, upon receiving such legal advice, the Independent Broad-based Anti-corruption Commission's (IBAC) position is that providing embargoed copies of its special reports to media outlets in advance of tabling is legal, prudent and appropriate, IBAC develop a rigorous and transparent policy identifying the basis upon which embargoed copies of special reports are provided to media outlets (and to which journalists) in advance of tabling, to guide its decision-making.	IBAC has partially implemented this recommendation and work is ongoing.	Please provide an update on the progress in implementing this recommendation.	<p>IBAC has partially implemented this recommendation - work is ongoing.</p> <p>IBAC determines its position on providing embargoed copies of a special report to witnesses and stakeholders on a case-by-case basis.</p> <p>The existing process to determine if IBAC will provide an embargoed special report is managed through the development and formal approval of a Stakeholder Engagement and Communication Plan (SEC plan).</p> <p>IBAC continues to consider the best practice measures available for maintaining confidentiality of a special report in instances it is released under embargo. Until IBAC resolves this issue,</p>

No.	Recommendation	Implementation progress advised by IBAC in a letter dated 31 October 2025	Committee Questions	IBAC Response
				<p>IBAC will not release special reports to media under embargo.</p> <p>IBAC has recently drafted a formal guideline for the development of SEC Plans – this guideline includes advice on embargoed reports. This guideline is currently undergoing an internal consultation and approval process.</p> <p>Importantly, the finalised guidance will articulate the matters to be considered when deciding to release an embargoed report, and the safeguards to help protect confidentiality until it is tabled.</p> <p>IBAC will provide its draft final guidance to the Integrity Oversight Committee.</p>

Performance of the Victoria Integrity agencies 2020/21: focus on witness welfare report

No.	Recommendation	Implementation progress advised by IBAC in a letter dated 31 October 2025	Committee Questions	IBAC Response
3	That if, upon receiving such legal advice, the Independent Broad-based Anti-corruption Commission's (IBAC) position is that providing embargoed copies of its special reports to media outlets in advance of tabling is legal, prudent and appropriate, IBAC develop a rigorous and transparent policy identifying the basis upon which embargoed copies of special reports are provided to media outlets (and to which journalists) in advance of tabling, to guide its decision-making.	IBAC has partially implemented this recommendation and work is ongoing.	Please provide an update on the progress in implementing this recommendation.	As above.
5	That the Independent Broad-based Anti-corruption Commission (IBAC): <ul style="list-style-type: none"> • update its policies and procedures to provide specific guidance on decision-making regarding confidentiality notice variation requests • consider developing and implementing an 	IBAC has partially implemented this recommendation and work is ongoing.	Please provide an update on the progress in implementing this recommendation.	<p>IBAC accepts this recommendation - work is ongoing.</p> <p>IBAC considers this recommendation to be partially implemented. Since its last update to the IOC in October 2025, IBAC has made additional progress including updates to relevant policies and procedures and improvements to associated processes. IBAC can now capture and report on the data relating to confidentiality notice variation requests and complaints received</p>

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	<p>application form for persons subject to a confidentiality notice who seek permission to disclose a specified matter to a third party, to assist in ensuring that such requests are appropriately recorded and assessed</p> <ul style="list-style-type: none"> • capture data relating to confidentiality notice variation requests to enable it to readily report on the number of requests received and approved during a particular reporting period • update its policies and procedures providing specific guidance on complaints regarding reputational harm or damage in connection with IBAC’s public examinations • capture data relating to complaints received regarding reputational harm or damage in connection with IBAC’s public examinations, to enable it to readily report 			<p>regarding reputational harm or damage in connection with IBAC’s public examinations, reflecting a more structured and consistent approach. Efforts are underway to ensure that this information is readily available and once the system updates are in place, IBAC will consider this recommendation as completed and closed.</p>

No.	Recommendation	Implementation progress advised by IBAC in a letter dated 31 October 2025	Committee Questions	IBAC Response
	on the number of complaints received during a particular reporting period.			

Inquiry into the performance of the Victoria Integrity agencies 2019/20 report

No.	Recommendation	Implementation progress advised by IBAC during the IOC's 2022/23 performance review	Committee Questions	IBAC Response
1	That the Independent Broad-based Anti-corruption Commission review its occupational health and safety strategies, policies and practices, and report to the Committee on the methodologies, processes and outcomes of that review. The review should focus on bullying, sexual harassment, occupational violence and discrimination. It should encompass both the conditions and steps necessary to ensure psychological safety in the workplace and the safe reporting of misconduct.	IBAC has partially implemented this recommendation and work is ongoing. IBAC is developing a new 2025 – 2028 Health, Safety and Wellbeing Plan, outlining six strategic priorities over the next three years. The plan is expected to be finalised February 2025.	Please provide an update on the Health, Safety and Wellbeing Plan.	<p>IBAC considers this recommendation implemented and closed.</p> <p>While our response to this recommendation can be considered closed, IBAC's focus on staff wellbeing and our commitment to a safe workplace are enduring, including through the Health Safety and Wellbeing Strategy, Mental Health Framework, Gender Equity Action Plan and performance and development and annual plan cycles. IBAC is committed to ensuring psychological safety in the workplace and the safe reporting of misconduct. In 2025/26 IBAC implemented the Health and Safety Management system, launched the Health Safety and Wellbeing Strategy, the Mental Health</p>

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				<p>Framework, the Accessibility Action Plan. IBAC also has a Psychosocial Framework and Family Violence Policy.</p> <p>IBAC has a number of methods for staff to raise concerns and issues of bullying, sexual harassment, occupational violence, discrimination and inappropriate behaviour including anonymous reporting through Stopline, the Appropriate Behaviours policy and Managing Misconduct policy.</p>